

## **ATTACHMENT I**

# ORIGINAL

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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GURSEWAK SINGH,

PLAINTIFF,

-against-

Case No:  
18-CV-5780

LINTECH ELECTRIC, INC.; LINDEN J. TUDOR,

DEFENDANTS.  
-----X

DATE: September 23, 2019

TIME: 10:45 a.m.

DEPOSITION of the Defendant,  
LINDEN J. TUDOR, taken by the Plaintiff,  
pursuant to a Court Order and to the  
Federal Rules of Civil Procedure, held at  
the offices of Diamond Reporting & Legal  
Video, 16 Court Street, Suite 907, Brooklyn,  
New York 11241, before Tina M. Haywood, a  
Notary Public of the State of New York.

1 TUDOR

2 tax returns anywhere?

3 A. Yes.

4 Q. Are those in the storage area?

5 A. No.

6 Q. Where do you have those?

7 A. In my file cabinet.

8 Q. And where is that?

9 A. In my office.

10 Q. You have all those records  
11 going back to when?

12 A. What year are you talking  
13 about?

14 Q. The last ten years.

15 A. I should have them.

16 Q. You have them all?

17 A. Yes.

18 Q. What was the gross income of  
19 the business in 2018?

20 A. Maybe 1.2 million or something.

21 Q. And how about 2017?

22 A. A little better, not much --  
23 actually, it was real bad the last year and  
24 a half because I was in hospital for an  
25 extended period.

1 TUDOR

2 Q. What would you estimate it to  
3 be in 2017? About the same?

4 A. About the same.

5 Q. And 2016; about the same?

6 A. Yes. They vary between 1.2 to  
7 1.7; somewhere in between that.

8 Q. As part of this lawsuit, you  
9 were asked questions and through your  
10 lawyer, you gave me answers and one of the  
11 questions I asked was "identify any  
12 witnesses you know who will be called at  
13 the time of trial who has information about  
14 what Mr. Gursewak Singh did and his work  
15 schedule and other information." You  
16 identified someone by the name of Dion and  
17 in quotes Doe. Who is that?

18 A. Dion is a consultant.

19 Q. And what do you mean  
20 "consultant"?

21 A. He reviewed my paperwork.

22 Q. What paperwork?

23 A. Things like -- he reviewed the  
24 contracts, the accounting.

25 Q. What's his background?